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CLERK, U.S. DISTRICT COURT
ST. PAUL, MINNESOTAUNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Plaintiff(s),

vs. *Ricky Freeman and
Brenda Faye Hunter*Case No. *11cv806 SRN/SER*
(To be assigned by Clerk of District Court)

1. *LaQuita Sullivan*
 2. *Regina Fisher*
 3. *Robert Lipscomb*
 4. *Memphis Housing Authority, a Corporation;* DEMAND FOR JURY TRIAL
 5. *Adrena James G. Carlos Osegueda* YES ☐ NO ☐
and Charisse Stewart
 7. *Turner Russell*
 9. *U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT, a Corporation;*
 Defendant(s) 10. *Lynn Grosso* 11. *Gregory Bernard King*

(Enter the full name(s) of ALL defendants in
 this lawsuit. Please attach additional sheets
 if necessary).

COMPLAINT

PARTIES

1. List your name, address and telephone number. Do the same for any additional plaintiffs.

a. Plaintiff

Name *Ricky Freeman and Brenda Faye Hunter*Street Address *1335 OAKDALE AVE. #208*County, City *DAKOTA, WEST. SAINT PAUL,*State & Zip Code *MINNESOTA. 55118*Telephone Number *651 460-0315/or 651 460-0314*
R.F. B.F.H.

SCANNED

APR 01 2011

U.S. DISTRICT COURT ST. PAUL

2. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption.

a. Defendant No. 1

Name *LAQUITA SULLIVAN (section 8) memphis Housing Authority*

Street Address *700 ADAMS AVE.*

County, City *Shelby, Memphis*

State & Zip Code *TN. 38105-5002*

b. Defendant No. 2

Name *Regina Fisher (Eligibility Specialist) memphis Housing Authority*

Street Address *700 ADAMS AVE.*

County, City *shelby, memphis*

State & Zip Code *TN. 38105-5002*

c. Defendant No. 3

Name *Robert Lipscomb (Director) memphis Housing Authority*

Street Address *700 ADAMS AVE.*

County, City *shelby, memphis*

State & Zip Code *TN. 38105-5002*

NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES AND ADDRESSES ON A SEPARATE SHEET OF PAPER.

Check here if additional sheets of paper are attached: ☒

Please label the attached sheets of paper to correspond to the appropriate numbered paragraph above (e.g. Additional Defendants 2.d., 2.e., etc.)

2.

d. Defendant NO. 4

NAME Memphis Housing Authority, a CORPORATION;

700 Adams Ave.

Shelby, Memphis

TN. 38105-5002

2.

e. Defendant NO. 5

NAME Adrena James (Memphis Housing Authority)

700 Adams Avenue

Shelby, Memphis

TN. 38105-5002

2.

F. Defendant NO. 6

NAME Charisse Stewart (Memphis Housing Authority)

700 Adams Avenue

Shelby, Memphis

TN. 38105-5002

2.

G. Defendant NO. 7

NAME Carlos Osegueda (Director) U.S. Department of Housing
And Urban Development. Five points Plaza, 40 Marietta Street.
Atlanta, GA. 30303-2806

2.

H. Defendant NO. 8

NAME Turner Russell (Director) office of enforcement
FHEO U.S. Department of Housing And Urban over →

Development Room 5226, 451-7th Street SW
WASHINGTON DC 20410-2000

2.

I. Defendant No. 9

NAME U.S. Department of Housing & Urban Development
Room 5226, 451-7th Street SW WASHINGTON DC 20410-2000
a Corporation; (Office of Enforcement FHEO)

2.

J. Defendant NO. 10

NAME LYNN GROSSO (Director) office of enforcement
FHEO U.S. Department of Housing AND Urban
Development Room 5226, 451-7th Street SW
WASHINGTON DC 20410-2000

2.

K. Defendant NO. 11

NAME Gregory Bernard King (senior Civil Rights Analyst/
Conciliator) U.S. Department of Housing AND Urban Development
Five Points PLAZA, 40 Marietta Street.
Atlanta, GA. 30303-2806

JURISDICTION

Federal courts are courts of limited jurisdiction. Generally, two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount of damages is more than \$75,000 is a diversity of citizenship case.

3. What is the basis for federal court jurisdiction? (*check all that apply*)

☒ Federal Question

☐ Diversity of Citizenship

4. If the basis for jurisdiction is Federal Question, which Federal Constitutional, statutory or treaty right is at issue? List all that apply. *sections 804b or f AND 804f3B of Title VIII of the Civil Rights Act of 1968 As Amended by the Fair Housing Act of 1988. AND SECTION 504 of the 1973 Rehabilitation Act.*
5. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party? Each Plaintiff must be diverse from each Defendant for diversity jurisdiction.

Plaintiff Name:

State of Citizenship:

Defendant No. 1:

State of Citizenship:

Defendant No. 2:

State of Citizenship:

Attach additional sheets of paper as necessary and label this information as paragraph

5.

Check here if additional sheets of paper are attached. ☐

6. What is the basis for venue in the District of Minnesota? (*check all that apply*)

☐ Defendant(s) reside in Minnesota ☐ Facts alleged below primarily occurred in Minnesota

☒ Other: explain *N/A*

STATEMENT OF THE CLAIM

Describe in the space provided below the basic facts of your claim. The description of facts should include a specific explanation of how, where, and when each of the defendants named in the caption violated the law, and how you were harmed. Each paragraph must be numbered

separately, beginning with number 7. Please write each single set of circumstances in a separately numbered paragraph.

THE COMPLAINT

7. the complainant belongs to a class of persons whom the ~~ACT~~ ACT protects from UNLAWFUL discrimination because of his mental disability. ~~some~~ some time during the summer of 2006, the complainant decided to move with his girlfriend, Brenda Hunter, A disabled person within the meaning of the Fair Housing ACT, to move from West St. PAUL, MINNESOTA to Memphis, Tennessee. the complainant asked the DAKOTA, MINNESOTA Community Development Agency (DAKOTA CDA) to transport his voucher to the Housing Authority in Memphis, Tennessee (MHA). the Memphis Housing Authority received the section 8 documents concerning the complainant's housing around ~~the~~ August 19, 2006. the MHA scheduled an appointment with the complainant so the complainant could complete his application for housing. the complainant kept his appointment at the MHA offices and applied for section 8 assistance through MHA on September 7, 2006. When the complainant completed his application, he added his girlfriend Brenda Hunter's name on his application under members of the household.

Attach additional sheets of paper as necessary.

Check here if additional sheets of paper are attached: ☒

Please label the attached sheets of paper to as Additional Facts and continue to number the paragraphs consecutively.

next
PAGE →

: Ricky Freeman C.N. 04-07-0190-8

REQUEST FOR RELIEF : Brenda Faye Hunter C.N. 04-07-0190-4

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking.

I Brenda Faye Hunter would like for the court to award me, the sum of 1 million dollars, and I Ricky Freeman would like for the court to award me, the sum of 1 million ~~dollars~~ dollars also, for pain and suffering, and emotional distress, because; Memphis Housing employees humiliated us they delayed my Ricky Freeman section 8 portability paperwork to be process, for five months. And "Failure to make a reasonable Accommodation" they (Memphis Housing Authority) and (U.S Department of Housing and Urban Development) treated us inhumane as disabled individuals, by refusing to put me, Brenda Faye Hunter on Ricky Freeman's section 8 application. I had adequate income and was rejected from Ricky Freeman's (section 8 lease) being rejected on Ricky Freeman's lease, made me feel upset, and nervous, because I am diabetic and has heart problems therefore I felt I would end up homeless.

continued
from page 4

THE COMPLAINT

7. on september 29, 2006 the Complainant requested Services consistent with the terms AND conditions Application to All persons who are qualified or eligible for services. the complainant Alleges that the MHA Staff with reasonably certain knowledge of his disability refused to grant his request for reasonable Accommodation in MHA's Policies And Procedures that would Allow him to place Ms. Hunter on the Application As A member of his household. these Acts by MHA And its employees intentionally delayed processing the Complainant's Section 8 Application, which impeded his Ability to Acquire Affordable housing. in Addition, the Complainant Alleges that the MHA And its Staff, the Respondents, with reasonably certain knowledge of the Complainant's disability And Ms. Hunter's disability, denied the Complainant And Ms. Hunter the opportunity to rent housing or otherwise made housing UNAVAILABLE to them As disabled persons And denied them the Opportunity to participate in section 8 Housing Choice Voucher Program for A period of three (3) months.

P.S

~~but~~ but actually it was five (5) months.

i had to pay full Rent from August 24, 2006 until February 1, 2007. i WAS Charged \$400.00 A month in October, 2006; \$400.00 A month in November, 2006; \$400.00 A month in

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December, 2006; \$400.00 in JANUARY, 2007; And, \$284.00 in february, 2007; And \$284.00 thereafter until April when my rent was reduced to \$220.00 A month. i WAS ^{NOT} repaid ANY monies by the Housing Authority for overpayment of rent.

P.S Memphis Housing Authority (respondents) claimed that they reimbursed me for the months that i paid the market rental rate without assistance during the portability process ~~due~~ due to Housing Authority's mistake in delaying the Addition of Ms. Hunter.

R.F. but this is not true, because i still have All my reciepts, for evidence.

P.S We (Ricky Freeman) AND (Brenda Faye Hunter) would like for the Court to AWARD us the total Amount of two million dollars, (2 million dollars) for the problems HUD. CAUSED us.

Signed this 15th day of January, 2009.

Signature of Plaintiff Mr. Ricky Freeman

Mailing Address 1335 OAKDALE AVE. #208
WEST SAINT PAUL, MINNESOTA
55118

Telephone Number 651 460-0315 April 1, 2011

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint and provide his/her mailing address and telephone number. Attach additional sheets of paper as necessary.

Brenda Shaye Hunter

1335 OAKDALE AVE. #208
WEST SAINT PAUL, MN. 55118

651 (460-0314) April 1, 2011